



THOMAS, LONG,
NIESEN & KENNARD

Attorneys and Counsellors at Law

NORMAN J. KENNARD
Direct Dial: 717.255.7627
nkennard@thomaslonglaw.com

October 11, 2011

Via Hand Delivery

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street, Filing Room
Harrisburg, PA 17101

Re: Armstrong Telecommunications Inc. v. Verizon Pennsylvania Inc., Verizon North LLC, MCI metro Access Transmission Services, LLC d/b/a Verizon Access Transmission Services and MCI Communications Services Inc., Docket Nos. C-2010-2216205, C-2010-2216311, C-2010-2216325 and C-2010-2216293

Dear Secretary Chiavetta:

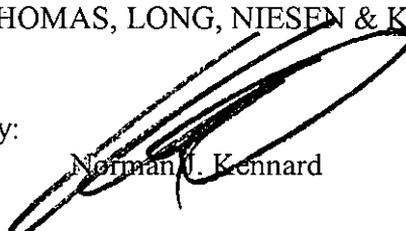
Enclosed please find an original and three (3) copies of the Objections of Armstrong Telecommunications Inc. to certain Set II Interrogatories of Verizon.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

THOMAS, LONG, NIESEN & KENNARD

By:


Norman J. Kennard

NJK:tl
enclosure

cc: Dennis J. Buckley, Administrative Law Judge
Per Certificate of Service

RECEIVED
2011 OCT 11 PM 3:47
PA PUC
SECRETARY'S BUREAU

BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION

RECEIVED
2011 OCT 11 PM 3:47
PA PUC
SECRETARY'S BUREAU

Armstrong Telecommunications Inc.,	:	
Complainant	:	
v.	:	Docket Nos. C-2010-2216205
	:	C-2010-2216311
Verizon Pennsylvania Inc., Verizon North	:	C-2010-2216325
LLC, MCI metro Access Transmission	:	C-2010-2216293
Services, LLC, d/b/a Verizon Access	:	
Transmission Services and MCI	:	
Communications Services Inc.	:	
Respondents	:	

OBJECTIONS OF ARMSTRONG TELECOMMUNICATIONS INC. TO CERTAIN INTERROGATORIES OF VERIZON PENNSYLVANIA INC., VERIZON NORTH LLC, MCIMETRO ACCESS TRANSMISSION SERVICES, LLC d/b/a VERIZON ACCESS TRANSMISSION SERVICES AND MCI COMMUNICATIONS SERVICES INC.

Armstrong Telecommunications Inc. (“Armstrong”), by and through its counsel in the above-captioned matter, and pursuant to the Commission’s regulations at 52 Pa. Code §§ 5.342 and 5.361, objects to certain of the Second Set of Data Requests of Verizon Pennsylvania Inc., Verizon North LLC, MCI metro Access Transmission Services, LLC d/b/a Verizon Access Transmission Services and MCI Communications Services Inc. (“Verizon”) as follows:

A. Discovery Standards

1. Commission regulations permit for the discovery of “any matter, not privileged, which is relevant to the subject matter involved in the pending action.” 52 Pa. Code §5.321(c).
2. Generally speaking, this Commission applies a standard of relevance which is less restrictive than that required by parties in order to present a document into the evidentiary record.

It is not ground for objection that the information sought will be inadmissible at hearing if the information sought appears reasonably calculated to lead to the discovery of admissible evidence.

52 Pa. Code §5.321(c). This broad approach to discovery is narrowed in certain circumstances. For example, material sought to be discovered must be relevant to the subject matter of the action and must not be privileged. *Id.* Further, materials are not discoverable if sought in bad faith or if the request is of such a nature that it would cause unreasonable annoyance, embarrassment, oppression, burden or expense. 52 Pa. Code §5.361(a)(1), (2).

3. Discovery may be obtained regarding any matter relevant to the subject matter. Relevant evidence is evidence that tends to make a fact at issue more or less probable. Moreover, evidence is relevant if it advances the inquiry in some degree and, thus, has probative value. Although the law does not furnish an absolute test of relevancy, the Pennsylvania Supreme Court follows a two-part analysis for determining relevance. In *Commonwealth v. Stewart*, 461 Pa. 274, 336 A.2d 282 (1975), the Court held that:

It must be determined first if the inference sought to be raised by the evidence bears upon a matter at issue in this case and, second, whether the evidence renders the desired inference more probable than it would be without the evidence.

Id. at 284.

4. Pennsylvania's courts have acknowledged that all discovery comes with some measure of annoyance and burden. *See, e.g., Merrifield v. Gavern*, 10 Pa.D.&C. 4th 541 (1991). The mere fact that discovery will be time consuming, burdensome and costly is not grounds for objection if this is the inevitable result of the facts under examination. *See Nardell v. Scranton-Spring Brook Water Service Company*, 24 Pa.D.&C. 2d 663 (1961).

B. General Objections

1. Armstrong objects to Verizon's Instructions and Definitions to the extent they purport to impose upon Armstrong any different or additional obligations from those imposed under the Public Utility Code and this Commission's regulations at 52 Pa. Code. In responding to

this discovery, Armstrong intends to and will respond in accordance with standard and acceptable Commission practice.

2. Armstrong objects to each request to the extent that it seeks documents or information equally available through public sources or records because such requests subject Armstrong to unreasonable and undue annoyance oppression, burden and expense. Armstrong will refer the requesting party to the Commission for all publicly available documents on record at the Commission, or to any other publicly available source.

3. Armstrong objects to each request to the extent that it seeks to impose an obligation on Armstrong to respond on behalf of subsidiaries, affiliates, or other persons that are not subject to the jurisdiction of the Pennsylvania Public Utility Commission (the "Commission") or are not parties to this proceeding on the grounds that such discovery is overly broad, unduly burdensome, oppressive, irrelevant and not likely to lead to the discovery of relevant or admissible evidence, and not permitted by applicable discovery rules.

4. Armstrong objects to each request to the extent it seeks information that requires complex responses. The function of interrogatories is to pose simple questions relating to a particular subject matter that may be answered by a brief categorical statement.

5. Armstrong has interpreted each request to apply to Armstrong's regulated intrastate operations in Pennsylvania and will limit its responses accordingly. To the extent any request is intended to apply to matters that take place outside of the Commonwealth of Pennsylvania and which are not related to Pennsylvania intrastate operations subject to the jurisdiction of the Commission and are not the subject of this proceeding, Armstrong objects to each such request as irrelevant, overly broad, unduly burdensome, not likely to lead to the discovery of relevant or admissible evidence, and oppressive.

6. Armstrong objects to each request to the extent it seeks information not reasonably calculated to lead to the discovery of admissible evidence and not relevant or material to the subject matter of this proceeding.

7. Armstrong objects to each request to the extent it is duplicative and overlapping, cumulative of another request, overly broad, and/or seek responses in a manner that is unduly burdensome, expensive, oppressive, or excessively time consuming to Armstrong to produce.

8. Armstrong objects to each request to the extent it seeks to obtain "all," "each," or "every" document, item, customer, or other such piece of information because such discovery is overly broad and unduly burdensome.

9. Armstrong objects to each request as overly broad and unduly burdensome to the extent such request seeks to have Armstrong create documents not in existence at the time of the request, or to produce documents not in Armstrong's possession, custody or control. Armstrong further objects to each request to the extent it seeks an analysis, calculation, or compilation which Armstrong has not performed previously and which Armstrong objects to performing.

10. Armstrong objects to each request as overly broad and unduly burdensome to the extent it is not limited to any stated period of time, or it pertains to a stated period of time that is longer than is relevant for purposes of the issues in this proceeding.

11. Armstrong objects to each request to the extent that it seeks to require information regarding "all persons." Such a request is unduly burdensome.

12. To the extent that any requested information is confidential and/or contains proprietary information, Armstrong will only produce it pursuant to the Protective Agreement in this docket. Any and all confidential and/or proprietary information produced by Armstrong in this proceeding is subject to the Protective Order.

13. Armstrong objects to the extent that any request seeks information subject to the attorney/client privilege, attorney work-product exemption, or other applicable privileges or immunities from disclosure, as contrary to the laws and rules governing privilege and exemption.

14. The objections, responses, and documents produced in response to each request are not intended nor should be construed in any manner to waive Armstrong's right to object to any and all requests as to their competency, relevancy, materiality, privilege and admissibility as evidence for any purpose, in or at the hearing of this or any other proceeding.

C. Specific Objections

In addition to the general objections set forth above, Armstrong incorporates by reference its previously filed objections to the Verizon Definitions 2 and 3. Armstrong also specifically objects to Verizon Interrogatories Set II, Nos. 1(d), 1(e), 1(f), 1(g), 3(e), 4, 9, 10, 12, 13, 14, 15, 19, and 20 on the following specific grounds:

1. **Interrogatory VZ II-1(d), (e), (f), and (g)** – Referencing Armstrong's response to Verizon I-5:

- (d) For each carrier listed in the attachment responding to Verizon I-5(9), and separately for each month listed in that attachment, state how much Armstrong paid the carrier for traffic destined to be terminated by Verizon. If it is not possible to provide a separate response for Verizon, then state how much Armstrong paid the carrier in total for each month and how many minutes-of-use Armstrong sent to the carrier that month.
- (e) Produce all agreements between Armstrong and each carrier identified in response to Verizon I-5(1) and each additional carrier identified in subpart (b) above describing the rates, terms and conditions for accepting traffic destined to be terminated by Verizon.
- (f) Referencing the attachment responding to Verizon I-5(9), provide the same information for the first 6 months of 2011, broken down by month, including information for any additional carriers identified in response to sub-part (b) above.
- (g) Separately for each month and for each carrier listed in response to subsection (f) above, provide the same information requested in subpart (d) above.

Objection: Armstrong incorporates by reference its general objections. Except for the objection as to the time period originally claimed in VZ I-5, which was modified by agreement in the response provided by Armstrong in response to VZ I-5, Armstrong also incorporates by reference its objections to VZ I-5 and I-7.

Any information relating to the pricing (compensation), that could lead to a calculation of the pricing (volumes) between Armstrong and the carriers identified in response to VZ I-5, or to the disclosure of the actual agreements themselves, is subject to confidentiality between those two parties and restricted from outside disclosure on behalf of both parties. Network confidentiality issues are also raised by Verizon's attempts to discover information regarding other carriers' traffic volumes and compensation terms. Verizon has previously requested in its Set I discovery (e.g. Nos. I-5, 7), and Armstrong has previously objected to, the provision of pricing information and copies of all agreements between Armstrong and the carriers to which Armstrong hands off traffic. Verizon did not move to compel the disclosure of that information. Its repeated request of relatively the same inquiry as Set II data requests is foreclosed as an untimely motion to compel.

Further, as Armstrong previously noted, Verizon has also objected to disclosure of information related to its intermediate carrier agreements (Verizon response to Armstrong I-40). Armstrong offered to discuss these matters further with Verizon; however, Verizon did not seek further discussions with Armstrong.

Finally, Armstrong notes that the response to which this interrogatory purports to follow up was provided by Armstrong to Verizon on March 4, 2011, over 7 months ago. If Verizon had legitimate follow up discovery to that response, it well could have submitted that discovery much earlier than three *weeks* before Armstrong's rebuttal testimony is due, and only 5½ *weeks* before

this matter proceeds to hearing. To impose a burden on Armstrong to provide detailed follow up to an interrogatory answered over 7 months ago at this late date in the proceeding when Armstrong is preparing final testimony and preparing for hearings would be highly prejudicial because it would require Armstrong to divert limited resources away from testimony and hearing preparation. Verizon should have undertaken to discover support for its theory-of-the-case well before its own direct testimony was filed, not after, and certainly not a matter of mere weeks before Armstrong is to prepare and file rebuttal testimony and proceed to hearing.

Subject to and without waiver of the objection, Armstrong will provide an updated attachment to VZ I-5 in response to VZ II-1(f).

2. **VZ II-3** – Referencing Armstrong’s response to Verizon I-18(1), where Armstrong states that it has only received traffic directly from certain tandem providers, and for the time period identified in that question:

- (e) Identify and produce all documents relating to any dispute or refusal of any of those carriers to pay Armstrong’s bills for intrastate switched access charges or reciprocal compensation.

Objection: Armstrong incorporates by reference its general objections and its specific objection to VZ I-18(1). Armstrong also objects specifically to this inquiry because it requests the identification and production of “all documents” for the time period specified in that question (VZ I-18(1)). A request for documents for the period of time specified in that question (January 1, 2008 to the present) is overly extensive and unduly burdensome. Prior requests for investigation of information over a three year period were objected to and not subject to a motion to compel. Therefore, restatement of an inquiry for an investigation over the same time period is foreclosed as an untimely motion to compel.

Further, the response to which this interrogatory purports to follow up was provided by Armstrong to Verizon on March 4, 2011, over 7 months ago. If Verizon had legitimate follow up

discovery to that response, it well could have submitted that discovery much earlier than three weeks before Armstrong's rebuttal testimony is due, and only 5½ weeks before this matter proceeds to hearing. To impose a burden on Armstrong to provide detailed follow up to an interrogatory answered over 7 months ago at this late date in the proceeding when Armstrong is preparing final testimony and preparing for hearings would be highly prejudicial because it would require Armstrong to divert limited resources away from testimony and hearing preparation. Verizon should have undertaken to discover support for its theory-of-the-case well before its own direct testimony was filed, not after, and certainly not a matter of mere weeks before Armstrong is to prepare and file rebuttal testimony and proceed to hearing.

Subject to and without waiver of the objection, Armstrong provided in response to VZ I-18 the identities of carriers from which Armstrong received traffic directly delivered to it for termination by Armstrong or its cable affiliate. On the same conditions and for the same time frames provided in response to VZ I-18, Armstrong will provide responses to VZ II-3(a-d) and will produce in response to VZ II-3(e) the most recent dispute received from those carriers.

3. **Interrogatory VZ II-4** – Referencing Armstrong's response to Verizon I-21 and I-22, for a call originated by Verizon and destined to Armstrong to be terminated to an end user of AUI, beginning at the exchange points between Verizon and Armstrong identified in response to I-21 (the two proprietary switches identified) and ending with the exchange point between Armstrong and AUI identified in the diagram produced in response to I-22:

- (a) describe specifically the Armstrong facilities, including all trunking and switches and any other relevant facilities, over which the traffic passes as it travels from the exchange point between Verizon and Armstrong to the exchange point between Armstrong and AUI.
- (b) provide a diagram of the facilities described in response to subpart (a).
- (c) state whether these facilities are owned by Armstrong. If the facilities or any portion of them are not owned by Armstrong, identify the owner.

Objection: Armstrong incorporates herein its general objections. Armstrong specifically objects to this inquiry on the basis that information beyond that provided in response to Verizon I-21 and I-22 is irrelevant and not likely to lead to the discovery of relevant information. The identification of such information beyond that which has already been provided by Armstrong is irrelevant to Armstrong's assertion of its contractual interconnection and tariff rights to compensation for termination of Verizon traffic and Verizon's defenses against Armstrong's demanded payment obligation.

Further, the interrogatory, requesting a description and diagram of "all trunking and switches and any other relevant facilities" over which traffic passes as it travels between Armstrong and Verizon, is overly broad and would cause unreasonable annoyance, oppression, burden and expense and require the making of an unreasonable investigation, particularly given the expedited nature of this proceeding and the belated date of the inquiry.

Telecommunications networks are complex and involve myriad individual pieces of equipment and facilities. For example, the question as written could require Armstrong to identify every piece of network facility used beyond the Verizon/Armstrong exchange point to connect Armstrong to AUI. To identify all such equipment would be onerous and unreasonable. The question is likewise vague and ambiguous as it relates to the request to provide a "diagram" of such equipment. Armstrong has no such diagram in existence and the production of such a diagram at such late date and such short time frame would present an unreasonable, unduly burdensome, and unduly expensive exercise.

Finally, the responses to which this interrogatory purports to follow up were provided by Armstrong to Verizon on March 4, 2011, over 7 months ago. If Verizon had legitimate follow up discovery to that response, it well could have submitted that discovery much earlier than three

weeks before Armstrong's rebuttal testimony is due, and only 5½ *weeks* before this matter proceeds to hearing. To impose a burden on Armstrong to provide detailed follow up to interrogatories answered over 7 months ago at this late date in the proceeding when Armstrong is preparing final testimony and preparing for hearings would be highly prejudicial because it would require Armstrong to divert limited resources away from testimony and hearing preparation. Verizon should have undertaken to discover support for its theory-of-the-case well before its own direct testimony was filed, not after, and certainly not a matter of mere weeks before Armstrong is to prepare and file rebuttal testimony and proceed to hearing.

Subject to and without waiver of the objection, Armstrong will endeavor to provide additional information beyond that already provided in response to Verizon I-21 and I-22.

4. **VZ II-9** – Identify all facilities, equipment or databases located outside of Pennsylvania that are used by Armstrong or AUI to provide service to AUI's customers (including components used to provide integrated, IP-enabled features and capabilities).

Objection: Armstrong incorporates herein its general objections. Armstrong specifically objects to this inquiry on the basis that production of the information requested is overly broad and unduly burdensome, would cause unreasonable annoyance, oppression, burden and expense and require the making of an unreasonable investigation, particularly given the expedited nature of this proceeding and the belated date of the inquiry. The question is likewise vague and ambiguous as it relates to the request to provide "databases."

Telecommunications networks are complex and involve myriad individual pieces of equipment and facilities. The question as written literally requires Armstrong to identify every piece of network facility and identify every "database" located outside of Pennsylvania and used to provide service to AUI's customers. To identify all such equipment would be onerous and unreasonable.

Armstrong also objects to the request to provide information with respect to facilities that are not used to provide intrastate traffic that is subject to this dispute as not relevant to this proceeding and not likely to lead to relevant information, and will not be provided.

Subject to and without waiver of the objection, Armstrong will provide a response with respect to facilities used to originate and terminate traffic in Pennsylvania.

5. **VZ II-10** – Does AUI offer any telephone service products that charge separately for “local” and “long distance” calls? If so please identify those products and the rates, terms and conditions of them.

Objection: Armstrong objects to Verizon II-10 as unnecessary, unduly burdensome and not likely to lead to relevant information. AUI is a cable company and neither its rates nor services are jurisdictional to the Commission. As previously noted by Armstrong, it does not object to Verizon's limited inquiry into AUI's operations as related to Verizon's spurious claims that, because the traffic delivered is terminated in Internet protocol, Verizon is excused, therefore, from compensating Armstrong under its lawful tariffs. However, the service products offered by AUI, including rates, terms, and conditions, is wholly irrelevant to this topic and discovery will not lead to any relevant information.

Subject to and without waiver of the objection, Armstrong will provide a response.

6. **VZ II-12** – Referencing Armstrong’s Intrastate Switched Access tariff, Pa. PUC No. 5, Section 6.1 stating:

The Company will provide Carrier Common Line Access Service to Customers in conjunction with Switched Access Service provided in Section 4 of this tariff. Carrier Common Line provides for the use of End Users’ Company-provided common lines by Customers for access to such End Users to furnish Intrastate Communications.

Identify all equipment and network facilities Armstrong contends are used to provide Carrier Common Line Access Service to Verizon and state what entity owns those facilities and provide

a diagram of such equipment. For each piece of equipment, state whether it is owned by Armstrong, AUI or another entity.

Objection: Armstrong incorporates herein its general objections. Armstrong specifically objects to this inquiry because the question is overly broad in that it requests Armstrong to identify "all" equipment and facilities that may be used to provide a common line. Telecommunications networks are complex and involve myriad individual pieces of equipment and facilities. For example, the question as written could require Armstrong to identify every piece of supporting structure, cable/ wire and termination equipment that is used to connect end users to its network. To identify all such equipment would be onerous and unreasonable. The question is likewise vague and ambiguous as it relates to the request to provide a "diagram of such equipment." Armstrong has no such diagram in existence and multiple configurations exist that would render the production of such a diagram an unreasonable, unduly burdensome, and unduly expensive exercise, particularly to be prepared at this late date and in this short time frame while Armstrong is also preparing its rebuttal testimony. This question relates to a long existing Armstrong tariff and could have been asked much earlier in this proceeding. To impose such a burden on Armstrong at this late date in the proceeding when Armstrong is preparing final testimony and preparing for hearings would be highly prejudicial by requiring Armstrong to divert limited resources away from testimony and hearing preparation.

Subject to and without waiver of the objection, Armstrong will provide a response.

7. **VZ II-13** – Referencing Armstrong's Intrastate Switched Access tariff, Pa. PUC No. 5, Sections 12.1.17, 12.2.16, 12.3.15, 12.4.13, 12.5.14, 12.6.13, identify all differences in the equipment or facilities used to provide Armstrong's Carrier Common Line Access Service in the service territories of Verizon PA and Verizon North versus in the service territories of United Telephone Company of Pennsylvania d/b/a Embarq, Citizens Telephone Company of Kecksburg, Windstream Pennsylvania, Inc., and North Pittsburgh Telephone Company.

Objection: Armstrong incorporates herein its general objections and its objection to VZ-II-12.

Subject to and without waiver of the objection, Armstrong will provide a response.

8. **VZ II-14** – Identify all equipment and facilities used by Armstrong to provide “local switching” to Verizon as defined in Pa. PUC No. 5, Section 4.2.3(B)(1) and provide a diagram of such equipment. For each piece of equipment, state whether it is owned by Armstrong, AUI or another entity.

Objection: Armstrong incorporates herein its general objections. Armstrong specifically objects to this inquiry because the question is overly broad in that it requests Armstrong to identify "all" equipment and facilities that may be used to provide its local switching service. Telecommunications networks are complex and involve myriad individual pieces of equipment and facilities. For example, the question as written could require Armstrong to identify every piece of power, electrical or safety equipment that supports facilities in its end office(s) because those facilities and equipment are necessary to provide "local switching." To identify all such equipment would be onerous and unreasonable. The question is likewise vague and ambiguous as it relates to the request to provide a "diagram of such equipment." Armstrong has no such diagram in existence and multiple configurations exist that would render the production of such a diagram an unreasonable, unduly burdensome, and unduly expensive exercise, particularly to be prepared at this late date and in this short time frame while Armstrong is also preparing its rebuttal testimony. This question relates to a long existing Armstrong tariff and could have been asked much earlier in this proceeding. To impose such a burden on Armstrong at this late date in the proceeding when Armstrong is preparing final testimony and preparing for hearings would be highly prejudicial by requiring Armstrong to divert limited resources away from testimony and hearing preparation.

Subject to and without waiver of the objection, Armstrong will provide a response.

9. **VZ II-15** – Identify all equipment and facilities used by Armstrong to provide “dedicated end office trunk ports” and “shared end office trunk ports” to Verizon as defined in Pa. PUC No. 5, Section 4.2.3(B)(2) and (3) and provide a diagram of such equipment. For each piece of equipment, state whether it is owned by Armstrong, AUI or another entity.

Objection: Armstrong incorporates herein its general objections. Armstrong specifically objects to this inquiry because the question is overly broad in that it requests Armstrong to identify "all" equipment and facilities that may be used to provide its “dedicated end office trunk ports” and “shared end office trunk ports.” Telecommunications networks are complex and involve myriad individual pieces of equipment and facilities. For example, the question as written could require Armstrong to identify every piece of power, electrical or safety equipment that supports facilities in its end office(s) because those facilities and equipment are necessary to provide “dedicated end office trunk ports” and “shared end office trunk ports.” To identify all such equipment would be onerous and unreasonable. The question is likewise vague and ambiguous as it relates to the request to provide a "diagram of such equipment." Armstrong has no such diagram in existence and multiple configurations exist that would render the production of such a diagram an unreasonable, unduly burdensome, and unduly expensive exercise, particularly to be prepared at this late date and in this short time frame while Armstrong is also preparing its rebuttal testimony. This question relates to a long existing Armstrong tariff and could have been asked much earlier in this proceeding. To impose such a burden on Armstrong at this late date in the proceeding when Armstrong is preparing final testimony and preparing for hearings would be highly prejudicial by requiring Armstrong to divert limited resources away from testimony and hearing preparation.

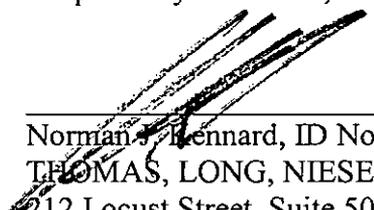
Subject to and without waiver of the objection, Armstrong will provide a response.

10. **VZ II-17** – Does AUI offer the same rates to end users for telephone service in the territories of Verizon PA, Verizon North, United Telephone Company of Pennsylvania d/b/a Embarq, Citizens Telephone Company of Kecksburg, Windstream Pennsylvania, Inc., and North Pittsburgh Telephone Company? If your answer is anything other than an unqualified “yes,” please identify all differences in rates.

Objection: Armstrong objects to Verizon II-17 as unnecessary, unduly burdensome and not likely to lead to relevant information. AUI is a cable company and neither its rates nor services are jurisdictional to the Commission. As previously noted by Armstrong, it does not object to Verizon's limited inquiry into AUI's operations as related to Verizon's spurious claims that, because the traffic delivered is terminated in Internet protocol, Verizon is excused, therefore, from compensating Armstrong under its lawful tariffs. However, the service products offered by AUI, including rates, terms, and conditions, is wholly irrelevant to this topic and discovery will not lead to any relevant information.

Subject to and without waiver of this objection, Armstrong will provide a response.

Respectfully submitted,



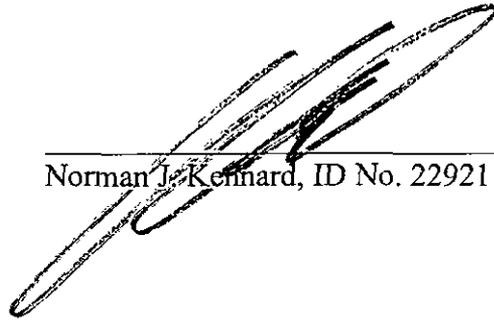
Norman J. Kennard, ID No. 29921
THOMAS, LONG, NIESEN & KENNARD
212 Locust Street, Suite 500
Harrisburg, PA 17108-9500
(717) 255-7600
Attorneys for
Armstrong Telecommunications, Inc.

Dated: October 11, 2011

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of October, 2011, I did serve a true and correct copy of the foregoing upon the persons below via electronic mail and first class mail as follows:

Suzan DeBusk Paiva, Esquire
Verizon
1717 Arch Street, 3rd Floor
Philadelphia, PA 19103



Norman J. Kennard, ID No. 22921

RECEIVED
2011 OCT 11 PM 3:48
PA PUC
SECRETARY'S BUREAU